



Patrick J. Heneghan
312.701.9323
heneghan@sw.com

May 24, 2012

Filed by ECF

Honorable Patty Shwartz
United States Magistrate Judge
United States District Court for the
District of New Jersey
Martin Luther King, Jr. Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: *In re Insurance Brokerage Antitrust Litig.*, Master Docket No. 04-5184,
MDL No. 1663**

Dear Judge Shwartz:

We write as counsel for the plaintiffs in the *New Cingular Wireless*, *Sears*, *Fortune Brands*, and *Henley Management* Tag Along cases. Pursuant to the Court's Order of earlier today (Docket # 2013), we have attached executed Declarations Concerning Material Covered by Discovery Confidentiality Order dated May 22, 2012.

Very truly yours,

A handwritten signature in blue ink, reading "Patrick J. Heneghan".

Patrick J. Heneghan

cc: All Counsel of Record (by ECF and service@gcg.mdl1663.com)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: INSURANCE BROKERAGE
ANTITRUST LITIGATION

MDL No. 1663
Civil No. 04-5184 (FSH)

APPLIES TO ALL ACTIONS

IN RE: EMPLOYEE-BENEFIT INSURANCE
BROKERAGE ANTITRUST LITIGATION

Civil No. 05-1079(FSH)

APPLIES TO ALL ACTIONS

**Exhibit A
Declaration Concerning Material Covered by
Discovery Confidentiality Order**

I, the undersigned, hereby declare that I have read the attached Discovery Confidentiality Order entered in the coordinated and consolidated actions before the District of New Jersey entitled In re: Insurance Brokerage Antitrust Litigation, Civil Action No. 04-5184 and In Re: Employee Benefit Insurance Brokerage Litigation, Civil No. 05-1079. I understand the terms of this Discovery Confidentiality Order.

I will comply with all of the provisions of the Discovery Confidentiality Order. I will hold in confidence, will not disclose to anyone not qualified under the Discovery Confidentiality Order, and will use only for the purposes expressly set forth in the Discovery Confidentiality Order, any Confidential Information or Attorneys' Eyes Only Information, including the substance and any copy, summary, abstract, excerpt, index, or description of such material that is disclosed to me. I agree to submit to the personal jurisdiction of the District of New Jersey in any proceeding related to the enforcement of this Discovery Confidentiality Order, including any proceedings related to contempt of Court. At the conclusion of my involvement in this matter, I agree to return all Confidential Information or Attorneys' Eyes Only Information which comes into my possession, and all documents and things that I have prepared relating thereto, to counsel from whom I received such materials.

I declare that the foregoing is true and correct. I understand that if any of the statements made by me are willfully false, I am subject to punishment.

Name of Individual: Patrick Heneghan

Present occupation/job description: attorney

Name of Company or Firm: Schopf + Weiss

Address: One S. Wacker Dr., 28th Floor, Chicago IL 60604

Telephone No.: 312-701-9300

Relationship to this action and its parties: counsel for New Cingular
Plaintiffs, Sears, Henley, Fortune Brands - tag-along liaison
counsel

Dated: 5/9/12

Patrick Heneghan
Signature

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DISTRICT OF NEW JERSEY**

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Name of Individual: Ian H. Fisher

Present occupation/job description: Partner, Schopf & Weiss LLP

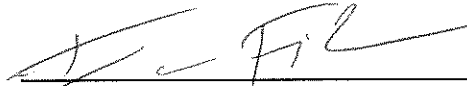
Name of Company or Firm: Schopf & Weiss LLP

Address: One South Wacker Drive, 28th Floor, Chicago, IL 60606

Telephone No.: 312-701-9316

Relationship to this action and its parties: Counsel for New Cingular Wireless, Sears Plaintiffs,
Fortune Brands, and Henley Mangement Plaintiffs.

Dated: 5/9/12



Signature

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DISTRICT OF NEW JERSEY**

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I declare that the foregoing is true and correct. I understand that if any of the statements made by me are willfully false, I am subject to punishment.

Name of Individual: Jennifer Waters

Present occupation/job description: Attorney - Partner

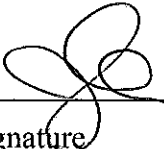
Name of Company or Firm: Schopf & Weiss LLP

Address: One South Wacker Drive, 28th Floor

Telephone No.: 312-761-9300

Relationship to this action and its parties: Counsel for NCW plaintiffs,
Sears, Henley, Fortune Brands

Dated: 5/9/12


Signature

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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Name of Individual: Timothy C. Samvelson

Present occupation/job description: attorney

Name of Company or Firm: Schoft & Weiss LLP

Address: One S. Wacker Dr., 28th Flr., Chicago, IL
60606

Telephone No.: 312-701-9300

Relationship to this action and its parties: One of the attorneys
for New Angular plaintiffs, Sears, Henley,
and Fortune Brands

Dated: 5/9/12

T. Samvelson
Signature

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DISTRICT OF NEW JERSEY**

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Name of Individual: Ellen Martin

Present occupation/job description: contract Attorney

Name of Company or Firm: Self Employed

Address: 135 Easy Street

Telephone No.: 919 967-3108

Relationship to this action and its parties: ~~06-51~~
tag along 06-5120

Dated: _____


Signature